

JOEL F. HANSEN, ESQ.
Nevada Bar No. 1876
COOPER LEVENSON, P.A.
1835 Village Center Circle
Las Vegas, NV, 89134
(702) 366-1125
jfhansen@cooperlevenson.com
Attorney for Plaintiff

LARRY KLAYMAN, ESQ.
D.C. Bar No. 334581
Klayman Law Firm
2020 Pennsylvania Ave. NW, Suite 800
Washington, DC 20006
Of Counsel

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

CLIVEN BUNDY,

Plaintiff,

v.

GLORIA NAVARRO, et al.,

Defendants.

Case No.: 2:16-cv-1047-JAD-GWF

PLAINTIFF'S REPLY TO FEDERAL
DEFENDANTS' OPPOSITION TO RENEWED
(SECOND) MOTION FOR EXTENSION OF
TIME *NUNC PRO TUNC*

Plaintiff hereby submits the following in response to Defendants United States, Harry Reid, and Kristen Orthman's ("Defendants") opposition to Plaintiff's renewed (second) motion for extension of time. (Docket No. 33). The United States Attorney's Office for the state of Nevada, counsel for Defendants, have chosen to responded defensively and hostilely to a run-of-the-mill request for extension of time, which is perhaps indicative of their motivation to protect and shield Defendant Gloria Navarro from liability, since Defendant Navarro is the Chief Judge in the United States District Court for Nevada. This, in an of itself, serves as evidence of the

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1 ongoing conspiracy, as alleged by Plaintiff, as each party obeys the marching orders of
2 Defendants Harry Reid, Rory Reid, and Barack Obama.

3 Moreover, Defendants' contention that Plaintiffs renewed motion "does not cure the
4 deficiencies that resulted in the denial of his first motion" is blatantly false. Docket No. 33 at 2.
5 Plaintiff's renewed motion complies fully with Local Rule 6.1, as it now (1) identifies the present
6 motion as the second motion, (2) identifies the filing dates of the subject motions in the first
7 paragraph, and (3) discusses why counsel for Plaintiff's inadvertent oversight was "excusable
8 neglect", as defined by the U.S. Court of Appeals for the Ninth Circuit in *Briones v. Riviera Hotel*
9 & *Casino*, 116 F. 3d 379 (9th Cir. Nev. 1997).

10 Lastly, in a transparent effort to confuse the court, Defendants make the false equivalency
11 between "prejudice" suffered by Defendants as a result of a two-day filing delay with alleged
12 "prejudice" from the underlying litigation itself. Whether Defendants allege that Defendants have
13 been prejudiced by the Plaintiff's claims is entirely irrelevant to this type of motion. In fact, any
14 Defendant in any type of claim can argue that they have been "prejudiced" as a result of litigation
15 against them. Defendants' attempt to discuss the merits of the case, as it pertains to their asserted
16 immunity, is also irrelevant and must be ignored.

17 For the foregoing reasons, Plaintiff has now complied with the requirements set forth by
18 Local Rule 6.1, and accordingly, Plaintiff's motion should be granted.

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20 Dated: August 23, 2016

Respectfully Submitted,

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22 By: /s/ Joel F. Hansen
23 **JOEL F. HANSEN, ESQ.**
24 Nevada Bar No. 1876
25 **COOPER LEVENSON, P.A.**
26 1835 Village Center Circle
27 Las Vegas, NV, 89134
28 (702) 366-1125
jfhansen@cooperlevenson.com
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that service of the foregoing REPLY TO FEDERAL DEFENDANTS' OPPOSITION TO PLAINTIFF'S RENEWED MOTION FOR EXTENSION OF TIME was made through the Court's CM/ECF filing and service system on all counsel of record, including the below-designated counsel, on August 23, 2016:

Greg Addington, Esq.
Assistant United States Attorney
100 W. Liberty Street, Suite 600
Reno, NV, 89501

Scott Bogatz, Esq.
Reid, Rubinstein & Bogatz
300 South 4th St., # 830
Las Vegas, NV, 89101

/s/ Joel F. Hansen